## REMARKS

Status

Claims 1, 3-5, 7, 9-12, 14, 17, 18, and 21-22 remain pending. Applicants have amended independent claims 1, 7, and 14.

Applicants thank the Examiner for withdrawal of the rejections under § 112 and the objections to the drawings.

With this Amendment and Response, a petition for a two-month extension of time is enclosed.

Rejections under § 103

In the Office Action, claims 1, 3-4, 7, 9-122, 14, 17-18, and 23-25 were rejected as obvious over U.S. Patent No. 6,597,812 to Fallon et al. in view of U.S. Patent No. 6,711,294 to Hamzy et al. Claims 5, 12, 21, and 22 were rejected as obvious over Fallon and Hamzy in view of U.S. Patent No. 5,727,090 to Yellin.

The Office Action maintains that it "the compression method of [Fallon03] is applicable to image data" (para. 16), and that Applicants' independent claims, which each recite, in part, "to determine" or "determining" "whether the read first character represents either one of a white portion or a black portion of the image," are obvious. The Office Action acknowledges, however, that Fallon does not specifically describe or limit operation to black and white image data.

Applicants have amended independent claims 1, 7, and 14 to recite "wherein one predefined compression code represents white image data, and another predefined compression code represents black image data." This amendment is described, for example, at paragraph 23 of the substitute specification. Fallon does not teach or suggest one compression code for white image data and another code for black image data. Rather, Fallon uses one code: "the dictionary index D[1], or code word '1', is utilized for the run-length encoding process." Col. 6, lines 24-25. There are design tradeoffs made

with Applicants claimed implementation, that are different, and are not taught or suggested by Fallon. Neither are they suggested by Hamzy.

The Office Action cites Hamzy for the proposition that "[r]un length encoding works best with black-and-white or cartoon-style graphics." Hamzy, however, does not teach or suggest that there can be benefits from checking only for black or white data, as opposed to any type of run, as in Fallon, or that using one code for black and one code for white would have particularly useful benefits with image data. In the portion quoted in the Office Action, Hamzy goes on to state that run-length encoding "is used extensively to compress icons, banners, and start-up logos." Col. 6, lines 25-26. There is no suggestion in Hamzy of the application of run-length encoding to the problem addressed by Applicants. Hamzy also states: "However, RLE is an arbitrary compression technique that may not match the device and, if it does, it may not be the best compression method." Col. 6, lines 26-29. Thus, it would not have been obvious from Hamzy to modify Fallon as proposed by the Office Action to reach Applicants claimed invention.

Applicants respectfully submit that the independent claims as amended are therefore patentable over the cited references.

The dependent claims are patentable because they depend from patentable base claims. They also may contain limitations not found in the cited art.

## CONCLUSION

The Applicants respectfully request that the Examiner reconsider the application and claims in light of this Amendment and Response, and respectfully submit that the claims are in condition for allowance. If, in the Examiner's opinion, a telephonic interview would expedite the favorable prosecution of the present application, the Applicants' attorney would welcome the opportunity to discuss any outstanding issues, and to work with the Examiner toward placing the application in condition for allowance.

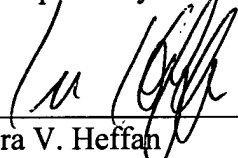Please continue to direct all correspondence to:

AGFA Corporation
Law & Patent Department
200 Ballardvale Street
Wilmington, MA 01887

Customer No. 21013

Respectfully submitted,

Date: January 23, 2006
Reg. No.: 41,059

Tel. No.: (617) 570-1777
Fax No.: (617) 523-1231

Ira V. Heffan
Attorney for the Applicant
Goodwin Procter LLP
53 State Street
Boston, MA 02109